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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 LOUIS FAHIM SENEGAL,

15 Defendant.

Case No. 2:19-cr-062-APG-DJA

STIPULATION TO CONTINUE
RESPONSE DEADLINE TO
GOVERNMENT'S OBJECTION TO
THE REPORT AND
RECOMMENDATION (ECF NO. 52)
(First Request)

ORDER

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Shaheen Torgoley, Assistant United States Attorney,
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
21 and Raquel Lazo, Assistant Federal Public Defender, counsel for Louis Fahim Senegal, that the
22 response deadline to the Government's Objection to the Report and Recommendation (ECF No.
23 52) currently scheduled for Friday, January 17, 2020, be vacated and set to Friday, January 24,
24 2020.
25
26

1 This Stipulation is entered into for the following reasons:

2 1. On December 20, 2019, the Magistrate Judge Albregts issued a Report &
3 Recommendation recommending that Senegal's Motion to Suppress Evidence be granted. ECF
4 No. 50. On January 3, 2020, the government timely filed its Objections. ECF No. 52.

5 2. Senegal's response to the government's objections is due on January 17,
6 2020. The parties are actively working towards a resolution in this case which would obviate
7 the need for continued litigation on the motion to suppress.

8 3. The requested continuance would permit the parties sufficient time to attempt to
9 negotiate the matter

10 4. The defendant is incarcerated and does not object to the continuance.

11 5. The parties agree to the continuance.

12 6. The additional time requested herein is not sought for purposes of delay, but
13 merely to allow counsel for defendant sufficient time within which to be able to effectively
14 prepare a reply.

15 7. Additionally, denial of this request for continuance could result in a miscarriage
16 of justice.

17 This is the first request to continue the response deadline date filed herein.

18 DATED this 9th day of January, 2020.

19
20 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

21
22 */s/ Raquel Lazo*
By _____

23 RAQUEL LAZO
24 Assistant Federal Public Defender

/s/ Shaheen Torgoley
By _____

25 SHAHEEN TORGLEY
26 Assistant United States Attorney

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